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UNITED STATES OF AMERICA

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10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 SOUTHERN DIVISION

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 v.
16 KHANH KIM NGUYEN,
17 Defendant.

No. 8:22-mj-00374-DUTY

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING CRIMINAL
COMPLAINT AND RELATED DOCUMENTS;
DECLARATION OF DANIEL S. LIM

(UNDER SEAL)

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19 The government hereby applies ex parte for an order that the
20 criminal complaint and any related documents in the above-titled case
21 be kept under seal until the government files a "Report Commencing
22 Criminal Action" in this matter.

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This ex parte application is based on the attached declaration of Daniel S. Lim.

Dated: May 20, 2022

Respectfully submitted,

TRACY L. WILKISON
United States Attorney

SCOTT M. GARRINGER
Assistant United States Attorney
Chief, Criminal Division

/s/ Daniel Lim

DANIEL S. LIM

Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DECLARATION OF DANIEL S. LIM

I, Daniel S. Lim, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. KHANH KIM NGUYEN, the criminal complaint and supporting affidavit, which was filed in the Central District of California on May 20, 2022.

2. The defendant charged in the above-captioned criminal complaint has not been taken into custody on the charge contained in the complaint and has not been informed that he is being named as a defendant in the complaint. The ability to apprehend the defendant might be jeopardized if the complaint in this case were made publicly available before the defendant is taken into custody. Furthermore, this complaint is related to three other indictments that have not been unsealed at this time. If the complaint in this case was made public, related targets, charged in related indictments, may flee from apprehension.

3. Accordingly, the government requests that the criminal complaint and related documents in this case be sealed and remain so until the defendant is taken into custody on the charge contained in the complaint and the government files a "Report Commencing Criminal Action" in this matter.

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1 4. I declare under penalty of perjury under the laws of the
2 United States of America that the foregoing is true and correct and
3 that this declaration is executed at Santa Ana, California, on May
4 20, 2022.

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DANIEL S. LIM